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## DENVER REGIONAL OFFICE



### FAX TRANSMISSION

### COVER SHEET

TO: Tom LORENZ

DATE: 8/13/02

EPA REGION VII

FAX PH: 913-551-7063

VOICE PH: 913-551-7292

FROM: \_\_\_\_\_

VOICE PH: (303) 844-1418

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FAX PH: (303) 844-3968

REMARKS: PLEASE CALL ME IF YOU HAVE QUESTIONS  
OR COMMENTS. THANKS.

FROM: 3038443968

P01

**U.S. Department of Commerce**  
Economic Development Administration  
Denver Regional Office  
1244 Speer Blvd., Suite 670  
Denver, CO 80204

**Draft - Environmental Assessment**

**Date:** August 12, 2002  
**EDA Ref.:** Control #70843  
**Applicant:** Land Clearance for Redevelopment Authority, St. Louis, MO  
**Project:** Building 2 Demolition and Disposal  
**Location:** St. Louis Army Ammunition Plant at Interstate 70 near Goodfellow Blvd.

**Project**

The project is called Building 2 Demolition and Site Preparation at St. Louis Army Ammunition Plant (SLAAP) located at Interstate 70 near Goodfellow Blvd. The estimated cost of the project is \$1,055,555; the EDA (Federal Govt.) funding is \$950,000 and the applicant is contributing \$105,555. The Building 2 is a large multistory shell building, approximately 68,000 sq. ft., which covered a rotary forge operation for the military during World War II.

My understanding of the scope of the project is:

- Preparation of a work plan for remediation (cleanup) of environmental contaminants of the building structure (excluding contaminants on the concrete slab, and in soil and groundwater), including a closure report, prior to the demolition of the building.
- Approval of the environmental remediation work plan, including a closure report, by the Missouri Department of Natural Resources, Federal Facilities Clean Division.
- Environmental remediation (cleanup) before the building demolition.
- Building demolition (excluding concrete slab and by cutting steel columns etc. at the concrete slab) and disposal.
- Should funds remain after completing the above items, those parts of the concrete floor slab that are not environmentally contaminated will be removed. Depending upon the funds, all parts of the concrete floor slab may not be removed. Should contaminated soil and groundwater be found under the concrete slab, the contaminated soil and groundwater shall not be cleaned up.

(Per Tom Cummings, EDA Project Officer, this will be accomplished during the bidding process using a deductive alternate. It is expected that the applicant will be able to award a portion of this line item, and have it based upon the funds remaining after the building is demolished. This will allow for unforeseen site conditions that result in change orders.)

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**Memorandum of Agreement**

The Amended Memorandum of Agreement between the Economic Development Administration, Department of Commerce, and the Office of Economic Adjustment, Department of Defense covers this project. David A. Sampson, EDA's Assistant Secretary, signed the memorandum on July 1, 2002. Per Para II.A.6 (Other Requirements) of the memorandum, this project is not subject to EDA's Investment Policy Guidelines and other discretionary requirements normally applicable to the EDA appropriated funds. Accordingly, EDA's Memorandum of June 30, 2000 (Interim Guidance and Clarification on EDA's Policy Regarding Projects Requiring Hazardous Waste Cleanup – EDA Directive No. 17.01) is not applicable to this project, which includes a significant amount of environmental cleanup.

**Beneficiaries**

The Land Clearance for Redevelopment Authority (LCRA), St. Louis, MO, is acting as a conduit for demolition of Building 2. Once this is done, the site will be transferred to a developer selected by the LCRA. Ultimately the community will benefit from the creation of new jobs by the development.

**Alternatives**

As discussed in the EDA application, Exhibit IV.A (Environmental Narrative), three alternatives have been considered:

1. Do Nothing
2. Wait For Environmental Cleanup and Site Transfer
3. Early Transfer for Concurrent Action for Cleanup and Development.

The selected alternative is for the Early Transfer of this contaminated federal property for environmental assessment, cleanup and redevelopment by the private sector. The Early Transfer is being collaborated among the General Services Administration, Department of Defense, the Land Clearance for Redevelopment Authority, the Missouri Department of Natural Resources, and the U.S. Environmental Protection Agency.

**Regulatory Agency Communication**

On August 12, 2002, I have discussed the project with the following and promised to fax them a copy of this Draft – Environmental Assessment:

- Ruben Zamarripa, Mo Dept. of Nat. Resources; Ph.: 573-751-7757; Fax: 573-526-5268
- Tom Lorenz, EPA Region VII; Ph.: 913-551-7292; Fax: 913-551-7063

**Affected Environment And Area Description**

The project (Building 2 Demolition and Site Preparation) is located at St. Louis Army Ammunition Plant (SLAAP) at Interstate 70 near Goodfellow Blvd. The Plant is approximately

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21 acres. The Building 2 is a large multistory shell building; approximately 68,000 sq. ft. that covered a rotary forge operation for the military during World War II. It is a steel structure covered by removable asbestos panels and glass windows that historically would have had lead in the caulking materials.

In the immediate vicinity of the project is an industrial park, Union Seventy Center, at Union Blvd. and Natural Road. Surrounding the site are the neighborhoods of Mark Twain I-70 Industrial, Mark Twain, and Walnut Park East and a new grocery store, Schuck's. The resources in the neighborhood include the St. Louis Job Corps Center at 4333 Goodfellow Blvd., a new training center being developed in Wellston, and west of the project site is the University of Missouri St. Louis campus that will be opening a new university research technology park in 2003.

The SLAAP property is composed of two parcels totaling 21.05 acres and currently has eight (8) unoccupied buildings that formerly housed SLAAP's main operating processes. Most of the buildings were constructed between 1940s and the 1950s. Some original buildings have already been removed. In 1944, SLAAP was converted from a 0.30 caliber small ammunitions plant to a 105 mm howitzer shell plant. SLAAP manufactured howitzer shells during 1944-45, and the Korean and the Vietnam wars. In 1989, the Department of the Army determined that SLAAP was no longer required to support its munitions mission, and all industrial equipment was removed from the plant. The Plant was totally vacated in the mid 1990s, because of which St. Louis lost over 4,000 jobs.

Regarding Building 2, the Army's Final Environmental Baseline Survey Report, Vol. 1, has Sections 10.2.2 (Building 2 Possible Areas of Environmental Concern), 11.2.2 (Building 2 Sampling Activities), and 12.2.2 (Building 2 Results). It appears Building 2 concrete slab, soil below and around the slab, and the groundwater are contaminated. The report does not address the environmental condition of the building structure (asbestos, PCBs, lead solder and paint, mercury tubes, switches and capacitors, etc.). However, it did say that debris and refuse are present throughout the building, and the remaining electrical equipment may contain PCBs.

Per Exhibit III.A of the application, the applicant has stated: "The attached cost estimate was based solely on limited general information on Building 2. Due to the secure nature of the site, access was not provided during the development of these costs. In addition, as-built drawings are non-existent. It is our (the applicant's) intent to further refine the estimated costs in the near future." Accordingly, for EDA's approval of the project, I recommend the following special conditions:

- 1. Prior to bidding and the disbursement of EDA funds, the grantee shall provide evidence satisfactory to EDA that:*

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- *An environmental assessment of the building structure has been performed.*
  - *An environmental remediation (cleanup) plan, including a closure report, for the building structure has been prepared and approved by the Missouri Department of Natural Resources (MDNR).*
2. *Prior to building demolition, the grantee shall provide evidence satisfactory to EDA that the environmental remediation (cleanup), including a closure report, per the MDNR's approved plan has been completed.*

**Background Information**

I have not visited the site. This environmental assessment is based on:

- The application, including exhibits and attachments
- The Amended Memorandum of Agreement between the Economic Development Administration, Department of Commerce, and the Office of Economic Adjustment, Department of Defense.
- A (Draft) Memorandum of Agreement among the U.S. Army, Aviation and Missile Command, the General Services Administration, and the Missouri SHPO.
- The GSA's note of July 15, 2002, regarding SHPO compliance.
- The Missouri Department of Natural Resources' note of July 25, 2002, regarding SHPO compliance.
- The Missouri Department of Natural Resources' note of May 15, 2002, regarding Early Transfer of the Ammunition Plant Site.
- The U.S. Fish and Wildlife Service clearance of August 12, 2002.
- The EDR's environmental note of August 5, 2002.

**Evaluation**

Per EDA's Form ED-538 (attached), the following environmental resources have been evaluated:

1. Geological Faults / Unique Features, Soils Stability / Steep Slopes: No impact.
2. Wetlands and Flood Plains: No impact.

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3. Vegetation, Wildlife, and Endangered Species: No impact per the U.S. Fish and Wildlife Service clearance of August 12, 2002.

4. Land Use and Zoning: No impact.

5. Prime/Unique Farmland: Not applicable.

6. Historic Resources: The Plant Site (and Building 2) is over 50-year old and is a National Register eligible property. There is a Memorandum of Agreement among the U.S. Army, Aviation and Missile Command, the General Services Administration, and the Missouri SHPO. The memorandum states:

- The SLAAP is a National Register eligible property and that the proposed remediation actions and excess actions are an adverse effect, per 36 CFR 800.5 (2)(ii).
- The (site) access actions, remediation and conveyance of title will have no effect upon archeological properties, as no known archeological properties are recorded within SLAPP.
- If in future disposal questions concerning reuse of structures or buildings other than Building 3 arise, GSA may need to revisit if this MOA meets their needs pursuant to Sections 110 and 111.

For EDA's approval of the project, a clearance from the SHPO is needed. If the clearance can not be obtained in time, because the financial year is coming to a close, I would recommend the special condition: *Prior to the bidding and prior to the disbursement of EDA funds, the grantee shall obtain a clearance from the SHPO and comply with SHPO's requirements, if any.*

7. Solid Waste Disposal: No impact.

8. Water (potable, operations, etc.): No impact. The City of St. Louis serves the site.

9. Water Resources (rivers, aquifers): The applicant has not provided any information about the rivers and aquifers. The site has contaminated groundwater, but the EDA project is not expected to have any negative impact.

10. Sewer System (storm and sanitary, hazardous substances): The applicant has stated: See attached letter. There is no letter attached. As the site is within the City of St. Louis, I do not expect any adverse impact. Moreover, the EDA's project is for the demolition of Building 2

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only.

11. Wild and Scenic Rivers: Not applicable.

12. Streets, Traffic, and Parking: No impact.

13. Ambient Air Quality (dust, odor, hazardous substances, etc.): The applicant has not addressed it. There would be an adverse impact on the air quality during the demolition of Building 2, but it would be a temporary impact. As there is asbestos in the building, there could be negative impact on the air quality during its removal. However, asbestos will be

removed by approval of an asbestos abatement plan by the Missouri Dept. of Natural Resources, and the impact would be mitigated by following proper procedures. *I recommend this as a special condition for EDA's approval of the project.*

14. Ambient Noise (operations, construction): There may be temporary impact during demolition.

15. Construction/Permits: The City of St. Louis will issue a demolition permit. The U.S. Army and the Missouri Department of Natural Resources will approve the demolition work plan, including a closure report. Accordingly, I recommend a special condition: *Prior to the bidding and prior to the disbursement of EDA funds, the applicant shall provide evidence satisfactory to the EDA that an approval for the demolition work plan, including a closure report, has been obtained from the U.S. Army and the Missouri Department of Natural Resources.*

16. Public Notification/Controversy: The applicant has stated that the public officials are involved. There appears to be no public controversy.

17. Environmental Justice: No impact.

18. Secondary and Cumulative Impacts: There would be no significant negative impacts provided the special conditions are met. The demolition project will enable the property to be used for potential development and job creation.

### Conclusion

Based on the application and the additional information provided by the applicant, the proposed project does not appear to be controversial or major in scope to warrant an environmental impact statement. I have analyzed this project for consistency with EDA's National Environmental Policy Act (NEPA) procedures, and find that the potential benefits of the project outweigh any impacts that may occur. In my opinion, the approval of the project will not violate the provisions and requirements listed under Items 2-3 of EDA's Project Review and Findings - Environmental

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Requirements (attached).

**Recommendation**

The project is recommended for approval with the following special conditions:

1. Prior to bidding and the disbursement of EDA funds, the grantee shall provide evidence satisfactory to EDA that:
  - An environmental assessment of the building structure has been performed.
  - An environmental remediation (cleanup) plan, including an asbestos abatement plan and a closure report, for the building structure has been prepared and approved by the Missouri Department of Natural Resources.
  - A clearance from the SHPO has been obtained and the grantee shall comply with the SHPO's requirements, if any.
  - The U.S. Army and the Missouri Department of Natural Resources have approved the demolition work plan, including a closure report.
2. Prior to building demolition, the grantee shall provide evidence satisfactory to the EDA that the environmental remediation (cleanup), including asbestos abatement and a closure report, per the Missouri Department of Natural Resources approved plan has been completed.

Prepared by: \_\_\_\_\_ Date: \_\_\_\_\_

Akhtar A. Alvi, P.E.  
Regional Environmental Officer